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*Of Attorneys for Defendant City of Portland*

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION

INDEX NEWSPAPERS LLC, a Washington  
limited-liability company, dba **PORTLAND**  
**MERCURY; DOUG BROWN; BRIAN**  
**CONLEY; SAM GEHRKE; MATHIEU**  
**LEWIS-ROLLAND; KAT MAHONEY;**  
**SERGIO OLMOS; JOHN RUDOFF;**  
**ALEX MILAN TRACY; TUCK**  
**WOODSTOCK; JUSTIN YAU;** and those  
similarly situated,

**3:20-cv-1035-SI**

**STIPULATED PROTECTIVE ORDER**

Plaintiffs,

v.

**CITY OF PORTLAND**, a municipal  
corporation; **JOHN DOES 1-60**, officers of  
Portland Police Bureau and other agencies  
working in concert; **U.S. DEPARTMENT OF**  
**HOMELAND SECURITY;** and **U.S.**  
**MARSHALS SERVICE,**

Defendants.

Pursuant to Fed. R. Civ. P. 26(c)(1) and (2), it is hereby stipulated and agreed by and between the respective parties hereto by their counsel of record the following:

1. Any video or digital recording of the deposition of any Plaintiff or Defendant, or any officer, agent, employee or former employee of Defendant City of Portland, shall be used only for purposes of this litigation.

2. No person shall disseminate the video or digital recording of a deposition to anyone not listed as an attorney of record, their legal assistants and support staff, or experts retained in this litigation. However, the parties agree that named Plaintiffs and named Defendants and deponents may view the video or digital recordings of depositions.

3. To the extent a video or digital recording of a deposition includes material designated for protection under the terms of the stipulated protective order previously entered in this matter (Dkt. 180) or any other similar order, such recording or portion thereof shall be filed under seal if used prior to trial. Such recordings need not be filed under seal if they do not contain material designated for protection under the terms of the stipulated protective order (Dkt. 180). The use of any video or digital recording of a deposition at or after trial shall be subject to further order of the court, but the party seeking to limit public access at trial shall bear the burden of justifying such limitation.

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4. This Stipulated Protective Order shall remain in effect until agreed otherwise by written stipulation signed by counsel for the parties hereto and filed herein, or until modified or terminated by order of this Court upon good cause being shown.

IT IS SO STIPULATED:

/s/Athul K. Acharya  
Matthew Borden | J. Noah Hagey  
Athul K. Acharya | Gunnar K. Martz  
*Attorneys for Plaintiffs*

Dated: September 23, 2020

/s/ Naomi Sheffield  
Denis Vannier | Naomi Sheffield  
Ryan C. Bailey | YoungWoo Joh  
*Attorneys for Defendant City of Portland*

Dated: September 23, 2020

**THIS STIPULATED PROTECTIVE ORDER IS HEREBY APPROVED.**

DATED: September 23, 2020.

  
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Hon. Michael H. Simon